

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

ZACHARY ADAMSON,

Plaintiff,

NOTICE OF MOTION

- VS -

CITY OF BUFFALO, CITY OF BUFFALO POLICE
DEPARTMENT, JOSEPH COOK, MICHAEL KEANE,
and SHARON ACKER,

Civil Docket No.: 11-CV-0663A

Hon. Hugh B. Scott, Magistrate Judge

Defendants.

MOTION MADE BY:

SPADAFORA & VERRASTRO, LLP Attorneys for
Plaintiff, ZACHARY ADAMSON

DATE, TIME & PLACE OF MOTION:

United States District Court, Western District of New York,
2 Niagara Square, 6th Floor, Genesee Courtroom, Buffalo,
New York 14202 at a date and time to be determined by the
Court.

RELIEF SOUGHT:

To compel discovery of, among others, Defendants' use of
force reports for the subject incident and past incidents,
formal complaints made against the officers, misconduct
reports, personnel files, internal affairs reports and
performance evaluations for five (5) years prior to the
subject incident and performance evaluations after the
subject accident.

GROUND FOR RELIEF:

Rules 16, 26, 34 and 37 of the Federal Rules of Civil
Procedure.


SUPPORTING PAPERS:

Affidavit of Joseph C. Todoro, Esq., sworn to the 30th day
of July, 2012; with exhibits attached thereto, and
Memorandum of Law.

REPLY PAPERS:

At the present time, Plaintiff intends to file and serve reply
papers.

DATED: July 30, 2012
Buffalo, New York



Joseph C. Todoro, Esq.
SPADAFORA & VERRASTRO, LLP
Attorneys for Plaintiff
2 Symphony Circle
Buffalo, New York 14201
(716) 854-1111

TO: Carmen J. Gentile, Esq.
Corporation Counsel
Attorneys for Defendants
1100 City Hall
65 Niagara Square
Buffalo, New York 14202
(716) 851-4332